

DATE OUT: 4/25/2014SUBJECT: **PRODUCT CHEMISTRY REVIEW OF: TGAI[]; MUP []; EUP [X]**BARCODE NO.: 406323 REG./FILE SYMBOL NO.: 61483-1PRODUCT NAME: Penta 5 Sure Treat Wood Protector Wood Preserver MRID NOS: 410027-02, 488407-01, 489053-02, 489053-03, and 489793-01COMPANY NAME: KMG-Bernuth, Inc. ACTION CODE: 676

FROM: Sergey Alekseyev, Chemist
Product Chemistry Team
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

THROUGH: Maria Rivera Piansay, Acting Team Leader
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

TO: Bonnie Adler, CRM
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

INTRODUCTION:

A Reregistration Eligibility Decision (RED), Case No. 2505, was issued on 09/25/2008 for the Active Ingredient Pentachlorophenol a.k.a. PCP. According to the RED, the generic database supporting the reregistration of Pentachlorophenol for currently registered uses has been reviewed and found to be substantially complete.

In the 8-month response to the Pentachlorophenol RED, KMG-Bernuth, Inc. provided EPA Form 8570-35 (Data Matrix), dated 05/25/2012; EPA Form 8570-4 (Confidential Statement of Formula), a basic formulation, dated 01/03/2014; a draft label, punch date 05/31/2012; a letter to CRM, dated 04/22/2014; and MRID Nos. 410027-02, 488407-01, 489053-02, 489053-03, and 489793-01. The registrant is requesting reregistration of the product, Penta 5 Sure Treat Wood Protector Wood Preserver, EPA Reg. No. **61483-1**.

FINDINGS:

1. EPA Reg. No. **61483-1** is an end-use product containing the active ingredient Pentachlorophenol (2,3,4,5,6-pentachlorophenol) and Other chlorophenols, with a label claim nominal concentration of 4.3% and 0.5%, respectively, and other ingredients content of 95.2%. The product is for use in pressure and thermal treatment of wood. The product is produced by a non-integrated system.
2. The CSF for the basic formulation is acceptable. The nominal concentration of the active ingredient agrees with that on the label, meeting PR Notice 91-2. The certified limits for the active ingredient and the inert ingredients are acceptable in accordance with 40 CFR §158.350. All ingredients are cleared for use in pesticide formulations.
3. Data reported in MRID Nos. 410027-02, 488407-01, 489053-02, 489053-03, and 489793-01 satisfy the product chemistry data requirements under Subgroups A and B which pertain to Product Identity and Composition, and Physical and Chemical Properties, respectively.
4. The Ingredients Statement on the draft label is acceptable as per 40 CFR §156.10(g) and PR Notices 91-2, 97-5, and 97-6. Physical or Chemical Hazards statements are in accordance with 40 CFR §156.78. The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice 83-3.

Note to PM: Storage and Disposal section should be evaluated for compliance with PR Notice 2007-4.

CONCLUSIONS:

The registrant has satisfied the product chemistry requirements for the reregistration of EPA Reg. No. **61483-1**.

Product Chemistry Data

Subgroup A: Series 830.1550 - 830.1800 (40 CFR 158.155 - 158.180)

GUIDELINE REFERENCE NO. (GRN)/ TITLE 830	40 CFR §	MRID Number	Data Fulfilled
.1550 Product Identity and Composition	158.320	CSF	Y
.1600 Description of Materials Used to Produce the Product	158.325	488407-01	Y
.1620 Description of Production Process	158.330		N/A
.1650 Discussion of Formulation Process	158.165	488407-01	Y
.1670 Discussion of Formation of Impurities	158.167	488407-01	Y
.1700 Preliminary Analysis	158.345		N/A
.1750 Certified Limits	158.350	CSF	Y
.1800 Enforcement Analytical Method	158.355	489053-02, 410027-02	Y

Subgroup B: Series 830.6302 - 7950 (40 CFR 158.190)

Guideline Reference No. (GRN) / Title 830	Value or Qualitative Description	MRID Number	Data Fulfilled
.6302 Color	Dark amber	489053-03	Y
.6303 Physical State	Liquid	489053-03	Y
.6304 Odor	Phenolic/diesel fuel	489053-03	Y
.6313 Stability	The product is not TGAI/MP		N/A
.6314 Oxidation/Reduction Chemical Incompatibility	The product is compatible with oxidizer/reducer.	489053-03	Y
.6315 Flammability/Flame Extension	53.2 °C	489053-03	Y
.6316 Explodability	The product is not potentially explosive.	Data matrix	N/A
.6317 Storage Stability	The product is stable after 14 days at 54 °C	489793-01	Y
.6319 Miscibility	The product is not intended to be mixed with petroleum distillates.	Letter to CRM	N/A
.6320 Corrosion Characteristics	Minor rust, no cracks or pitting on a coupon (carbon steel) after 14 days at 54 °C	489793-01	Y
.6321 Dielectric Breakdown Voltage	The product is not for use around electrical equipment	Data matrix	N/A
.7000 pH	3.73	489053-03	Y
.7050 UV/ Visible Light Absorption	Not applicable. The product is not TGAI/MP.		N/A
.7100 Viscosity	4.1 cSt at 20 °C; 2.6 cSt at 40 °C	489053-03	Y
.7200 Melting Point	Not applicable. The product is not TGAI/MP.		N/A
.7220 Boiling Point	Not applicable. The product is not TGAI/MP.		N/A
.7300 Density/Bulk Density	0.864 (7.19 lbs/gal)	489053-03	Y
.7370 Dissociation Constant in Water	Not applicable. The product is not TGAI/MP.		N/A
.7550 Octanol/ Water Partition Coefficient	Not applicable. The product is not TGAI/MP.		N/A
.7840 Solubility to Water and Organic Solvents	Not applicable. The product is not TGAI/MP.		N/A
.7950 Vapor Pressure	Not applicable. The product is not TGAI/MP.		N/A

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap;
U = Upgradeable; I = Incomplete or in progress; W = Waived